

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

DECLARATION OF CHELSEA KADISH

Pursuant to 28 U.S.C. § 1746, I, Chelsea Kadish, Esq., hereby declare as follows:

1. I am a resident of the State of Maryland. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Department of Public Safety and Corrections (hereinafter “DPSCS”) as a Director of Labor Relations.

3. DPSCS’s mission is to “protect[s] the public, its employees and those under its supervision, aiming to ensure a safe environment for all Marylanders by increasing security and providing tools for offenders to stay out of the criminal justice system.”

4. As a Director of Labor Relations with DPSCS, I work with management and our labor partners to resolve conflicts and monitor issues through our dispute resolution protocol, which includes the use of Federal Mediation and Conciliation Service (FMCS).

5. DPSCS has one of the largest unionized staffs in the State of Maryland with over 8,500 Union members across four unions. Our staff are represented by the American Federation of State County and Municipal Employees (AFSCME), the American Federation of Teachers—Healthcare (AFT—Healthcare), the Maryland Professional Employees Council (MPEC), and the State Law Enforcement Officers Labor Alliance (SLEOLA).

6. I submit this declaration in connection with Executive Order 14,238, “Continuing the Reduction of the Federal Bureaucracy,” which directed seven federal agencies, including FMCS, to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.

7. DPSCS has collective bargaining agreements with AFSCME, SLEOLA, AFT—Healthcare, and MPEC, all of which provide for the use of FMCS for neutral fact finding upon appeal from a decision of the Secretary of Budget and Management or their designee. Additionally, FMCS mediators have been utilized by DPSCS to assist in resolving larger matters.

8. In the past, FMCS has assisted DPSCS in resolving critical and high-profile labor matters such as a major dispute dealing with overtime and drafting policies.

9. FMCS’s services—which were provided at minimal cost to the parties—successfully resolved the dispute and resulted in a major agreement between DPSCS and AFSCME around overtime policy which is still in place today.

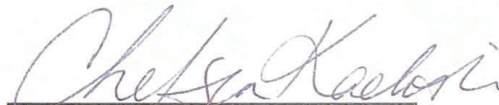
10. In my opinion, FMCS’s dispute resolution services are critical for resolving labor disputes in Maryland. For DPSCS, specifically, the availability of qualified neutrals that are trusted by both DPSCS and our union partners is essential for reducing litigation costs and delays by promoting confidence in the decision-makers and the dispute resolution process.

11. According to public reporting, “almost the entire workforce” at FMCS has been placed on administrative leave and “only a ‘skeleton crew’ of about a dozen employees will remain.”¹ I do not believe that the agency can continue to perform its statutory mission with such a dramatic reduction in personnel.

12. If FMCS’s services were “eliminated,” as the executive order directs and the mass layoffs appear to contemplate, then to resolve disputes DPSCS would need to rely on our already overstretched State Labor Relations Board; hire costly private arbitrators; or else risk litigation that could result in a major judgment against the State. Any of those alternatives would increase costs, delay, or the risk of an unfavorable outcome for Maryland.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on April 1, 2025, at Frederick, Maryland.


Chelsea Kadish

¹ Jory Heckman, *Federal labor mediation agency cuts staff down to “skeleton crew,”* Federal News Network (Mar. 26, 2025), <https://federalnewsnetwork.com/workforce/2025/03/federal-labor-mediation-agency-cuts-staff-down-to-skeleton-crew/>